

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

ANDREW GAVIN WYNNE

Defendant.

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) No. 4:22 CR 076 SEP
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OBJECTIONS TO THE PRESENTENCE REPORT

COMES NOW defendant, Andrew Gavin Wynne, through his attorney, Bevy Beimdiek, Assistant Federal Public Defender, and files objections to the following paragraphs of the Presentence Report:

1. ¶ 24: Mr. Wynne objects to the allegations related to the use of a notary seal of P.B. This allegation was not admitted in the plea agreement and the parties did not agree to this allegation.
2. ¶ 30: Mr. Wynne objects to the allegations related to the use of a Notary Public stamp.
3. ¶ 38: Mr. Wynne objects to the application of two levels for the possession or use of any authentication feature (a Notary Seal). The parties did not agree to this enhancement.
4. ¶ 42 and 46: Mr. Wynne contends his adjusted offense level should be 25 and his Total Offense Level after acceptance should be 22.
5. ¶ 79: Mr. Wynne contends his guideline imprisonment range should be 41-51 months.

Respectfully submitted,

/s/Bevy A. Beimdiek

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Derek Wiseman, Assistant United States Attorney.

/s/Bevy A. Beimdiek
Bevy A. Beimdiek
Assistant Federal Public Defender